

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

FILED
2-8-08
FEB 08 2008

MAGISTRATE JUDGE VALDEZ

v.

MICHAEL G. DENNIS and
JONATHON EIBER

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

CRIMINAL COMPLAINT

08CR 0120
CASE NUMBER:

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 7, 2008 in Cook county, in the Northern District of Illinois defendants,

did, by intimidation, take from the person and presence of another, approximately \$26,049.00 in United States Currency belonging to, and in the care, custody, control, management, and possession of a bank, namely, Standard Bank and Trust, 2400 West 95th Street, Evergreen Park, Illinois, whose deposits were then insured by the Federal Deposit Insurance Corporation,

in violation of Title 18 United States Code, Sections 2113(a) and 2

I further state that I am a(n) Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

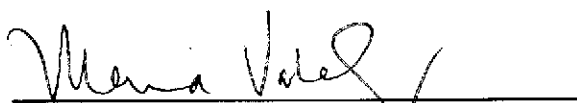

Signature of Complainant

Sworn to before me and subscribed in my presence,

February 8, 2008 at
Date

Chicago, Illinois
City and State

MARIA VALDEZ, U.S. Magistrate Judge
Name & Title of Judicial Officer


Signature of Judicial Officer

STATE OF ILLINOIS)
) ss
COUNTY OF COOK)

AFFIDAVIT

I, Bryan K. Watson, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been so employed for nearly four years. I am assigned to the FBI Chicago Division Field Office, South Resident Agency, Violent Crimes and Major Offenses Unit. My duties include the investigation of various violent crimes, including violations of Title 18, United States Code, Section 2113, Bank Robbery.

2. This Affidavit is in support of a complaint charging MICHAEL G. DENNIS ("DENNIS") and JONATHON EIBER ("EIBER") with bank robbery in violation of Title 18 U.S.C. Section 2113(a). The information in this Affidavit is based on my own investigation as well as on information I have compiled and received from other sources. This affidavit does not contain all the details of the information known to me regarding the events described herein.

3. On February 7, 2008, at approximately 7:30 am, Standard Bank & Trust, (the "Bank"), which was then federally insured by the Federal Deposit Insurance Corporation, located at 2400 West 95th Street, Evergreen Park, Illinois, was robbed by a male individual. Approximately \$26,049.00 of United States Currency ("USC") was taken from the Bank.

4. According to witness statements, the male individual, (hereinafter, "Robber"), wearing a black "hoodie" sweatshirt, blue jeans, and a mask, approached the drive thru walk up window. The teller on duty, later identified as DENNIS, reported that while at the window, the Robber presented him with a type written note that was inscribed, "I want you to give me the money I have a gun and I will use it if I have to I want Two straps of \$100 Two straps of \$50 and Two straps of \$20."

DENNIS provided law enforcement with the original demand note.

5. After reading the bank robbery demand note, DENNIS stated that he placed the note in a chair and told his supervisor that he was being robbed. DENNIS' supervisor told DENNIS to give the Robber what he wants.

6. DENNIS stated that he gave the Robber approximately \$26,049.00 from his teller's drawer. The Robber then fled on foot toward Western Avenue. DENNIS' account of the robbery was corroborated by his supervisor.

7. The Bank was equipped with a closed circuit surveillance system which captured the robbery. A review of the Bank's video surveillance showed that the Robber was wearing a dark colored "Hoodie" shirt, blue jeans, white tennis sneakers, and a dark scarf-like mask which covered the Robber's face.

8. In addition, DENNIS admitted that there was a possibility that he could retrieve the stolen money, but asked whether in that event, the Robber would be arrested.

Michael G. Dennis interview with Evergreen Park Police Department

9. Evergreen Park police officers read DENNIS his *Miranda* rights, which he stated he understood, and then he signed a form waiving those rights. After agreeing to be interviewed, DENNIS confessed to being involved in the February 7, 2008 bank robbery of the Standard Bank & Trust, located at 2400 West 95th Street, Evergreen Park, Illinois along with his friend, EIBER.

10. DENNIS identified the Robber as EIBER. DENNIS stated that on February 6, 2008 at approximately 10:00 pm, he went to EIBER's house. DENNIS reported that he has known EIBER since fifth grade. DENNIS stated that while he was at EIBER's house, he came up with a plan in which EIBER would type a bank robbery note. DENNIS stated he told EIBER what to type in the

note and how much money they were going to steal. DENNIS further mentioned that he told EIBER that he should come to the drive thru walk up area of the Bank with that demand note. DENNIS instructed EIBER to then hand DENNIS the note. After DENNIS received the note, he told his supervisor that the Bank was being robbed. DENNIS then told the officers where EIBER lives and where the officers could find the stolen money.

Jonathon Eiber Interview with Evergreen Park Police Department

11. On February 8, 2008, police officers with the Evergreen Park Police Department went to EIBER's residence. EIBER's mother answered the door and gave consent to search her residence. Upon entering the residence, the officers spoke to EIBER. EIBER showed the officers where they could find the stolen money. The officers recovered the majority of the stolen money, as well as the jacket and scarf EIBER wore when committing the robbery. EIBER was then brought to the Evergreen Park Police Department.

12. Investigating officers read EIBER his *Miranda* rights, which he stated he understood, and he signed a form waiving those rights. EIBER then agreed to be interviewed and wrote a written statement regarding his involvement in the bank robbery on February 7, 2008.

13. In his written statement, EIBER stated in his written confession that on February 6, 2008, at approximately 10:30 pm, DENNIS went to EIBER's residence and told him the plan for robbing the bank. DENNIS told EIBER that he was opening the Bank the next day and that there would be only a security guard and his supervisor at the Bank. DENNIS told EIBER that all he had to do was walk up to the "walk up" window and pass a note that demanded money. EIBER agreed to DENNIS' plan.

14. At about 3:00 am on the following morning (February 7, 2008), EIBER reported that he typed the bank robbery demand note and printed the note on his computer.

15. According to EIBER, at approximately 7:30 am, EIBER went to the Bank and approached the "walk up" window where DENNIS was working. EIBER gave DENNIS the bank robbery note. DENNIS gave EIBER the money and EIBER went to his parked car near the bank and drove to his residence.

16. EIBER said he then placed the money in an air duct at his house.

Conclusion

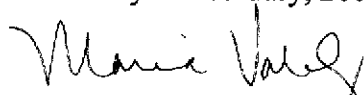
17. Based on the foregoing, I believe there exists probable cause to believe that DENNIS and EIBER, by force and violence, and by intimidation, took from the person and presence of another money belonging to and in the care, custody, control, management, and possession of Standard Bank & Trust, Evergreen Park, Illinois, a federally insured institution, in violation of Title 18, United States Code, Sections 2113(a).

FURTHER AFFIANT SAYETH NOT.



BRYAN K. WATSON, Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME
this 8th day of February, 2008.



UNITED STATES MAGISTRATE JUDGE